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July 22, 1998

BY MESSENGER

Ms. Alva E. Smith
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 4766

Dear Ms. Smith:

As we discussed on the telephone today, I write to request an additional extension in which to respond on behalf of Senator Mitch McConnell to the complaint in MUR 4766. Originally, Senator McConnell's response was due on July 21. By letter dated July 14 (copy attached), the Commission granted the Senator an additional seven (7) days in which to respond. By this letter, we request an additional extension of thirteen (13) days. If the Commission grants this additional extension, the Senator's response will be due on or before August 10, 1998.

The reason for this additional request is that the complaint continues to present difficult issues of election law, including whether the potential issue advertisements described in the complaint are subject to regulation by the Commission. Also, as the complaint does not name Senator McConnell as a respondent or articulate a theory under which he could be in violation of the Federal Election Campaign Act of 1971, as amended, it is taking more time than anticipated to evaluate the complaint and prepare a response. In addition, as the complaint is not based on information and belief, it is taking us more time than anticipated to ascertain the relevant facts surrounding the complaint. Finally, long-scheduled, conflicting professional commitments of lawyers and witnesses will delay our ability to prepare the response.

Thank you for your attention to this matter.

Sincerely,


Michael A. Dawson